

JANE DIRENZO PIGOTT

EPA Region 5 Records Ctr.



202446

May 9, 2003

VIA FEDERAL EXPRESS

Eileen L. Furey
Associate Regional Counsel (C-14J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

RE: Request for Information Pursuant to Section 104(e) of CERCLA for Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo and Allegan Counties, Michigan

Dear Ms. Furey:

This letter is a response to the letter dated March 4, 2003 from Janice S. Loughlin to Michigan Paperboard Company ("MPC") and received by MPC on March 11, 2003. I represent MPC in connection with this response. Enclosed please find the response of MPC to the 104(e) request. Please direct any questions or comments concerning this response to the undersigned.

Sincerely,

Jane DiRenzo Pigott

Enclosure

cc: Mark Reed
Kim Peterson

**RESPONSE OF MICHIGAN PAPERBOARD COMPANY, LP ("MPC") TO THE
REQUEST FOR INFORMATION PURSUANT TO SECTION 104(E) OF
CERCLA FOR ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE IN KALAMAZOO AND ALLEGAN COUNTIES,
MICHIGAN**

MPC has a document retention policy that delineates MPC's policy with regard to the length of time specific types of documents are to be retained. The retention periods under the policy range from two years to indefinitely. Under MPC's policy the types of documents requested in this Section 104(e) request would not have a retention period exceeding 7 years. Consequently, many of the documents requests no longer exist at MPC. A copy of this policy is enclosed. Compliance with this policy has resulted in the previous destruction of a number of documents that would have been responsive to this request.

Responsive and relevant documents that are still in existence at the MPC Mill are being produced.

MPC currently operates one mill that produces food-contact paperboard made from recycled fiber located at 79 East Fountain Street, Battle Creek, MI ("MPC Mill"). The current owner and operator of the MPC Mill purchased the facility in an asset purchase in April 1984. The following summary relates to operations at the MPC Mill since the April 1984 asset purchase. The MPC Mill utilizes its own fiber standards that are stricter than the industry standards, for the recycled fiber it buys for its processes. It utilizes these strict standards to meet its customers' demands for the highest quality food-contact paperboard and to meet the FDA requirements and industry best practices with regard to food-contact paperboard. MPC only produces a high quality food-contact paperboard at the MPC Mill. Recycled fiber that contains polychlorinated biphenyls, NCR paper broke or NCR paper converter would not meet the MPC fiber standards. The MPC Mill discharges water from its processes in two manners: under a National Pollutant Discharge Elimination System permit ("NPDES permit") issued by the Michigan Department of Environmental Quality ("MDEQ") and an Authorization from the City of Battle Creek, Michigan ("sewer permit". The MPC Mill's discharge under the NPDES permit consists of storm water and noncontact cooling water. The storm water is gathered and protected pursuant to a Pollution Incident Prevention Plan, Spill Prevention Control and Countermeasure Plan and a Storm Water Pollution Prevention Plan. The non-contact cooling water is a combination of river water and well water, with a remote possibility that some city water is used as make-up water on occasion. The process is designed so that this water cannot and does not come into contact with the MPC Mill processes at all before its discharge. While this discharge is not tested for hazardous substances, there is no reason to believe that the water discharged under the NPDES permit by the MPC Mill contains any hazardous substance that was added to the water due to

the operations of the MPC Mill. The second source of water discharge from the MPC Mill is pursuant to the sewer permit. The process water from the MPC Mill is discharged to the City of Battle Creek under the sewer permit. This discharge is not tested for hazardous substances, but the paperboard produced at the MPC Mill is tested regularly in accordance with the RPTA Chemical Testing Protocol for Food-Contact Paperboard made from Recycled Fiber dated September 21, 2001, and these tests have never indicated the presence of any of the hazardous substances tested for under this protocol. Consequently, there is no reason to believe that the water discharged under the sewer permit by the MPC Mill contains any hazardous substances. The MPC Mill holds an air permit issued by the MDEQ; this permit does not have any limits for or testing required for hazardous substances.

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

Mark Reed, General Manager, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 319 Midlakes Blvd., Plainwell, MI 49080, (269) 685-8027.

Bill Bryant, Fiber Buyer, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 23812 15 Mile Rd., Bellevue, MI 49021, (269) 763-0147.

Dan Conway, Controller, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 6490 Winddrift, Kalamazoo, MI 49009, (269) 375-2895.

Ron Fox, Operation Manager, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 13752 J Drive North, Battle Creek, MI, (269) 789-0662.

James M. Hosking, Process Engineer, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 3764 Laureke Lane, Ceresco, MI 49033, (269) 879-2296.

Mike Hughes, Mechanical Buyer, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 1045 Clear Lake Ave., Battle Creek, MI 49014, (269) 964-0697.

Chad J. Longcore, Technical Superintendent, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek, MI 49017, (269) 963-4004; home address and phone: 4835 Spinnaker St., Portage, MI 49002, (269) 329-0845.

Don Royster, Plant Engineer, Michigan Paperboard Company, 79 East Fountain Street, Battle Creek MI 49017, (269) 963-4004; home address and phone: 14998 19 Mile Road, Marshall, MI 49068, (269) 781-2145

MPC requests that all initial contact relating to this request with the people delineated above in response to this request be done through MPC's attorney: Jane DiRenzo Pigott, 605 Arbor Vitae Rd., Winnetka, IL 60093, P: (312) 961-5955, F: (312) 628-4745, or jdpigott@aol.com.

- 2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.**

A thorough review of MPC's files and the corporate environmental files was undertaken in response to this Section 104(e) request. A copy of documents that are relevant and responsive to the other requests in this 104(e) response are enclosed herewith.

- 3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.**

Please see response to request #5 below.

- 4. Identify and generally describe each Michigan Paperboard mill, as that term is defined in Attachment 5.**

MPC currently owns one mill. It is located at 79 East Fountain Street, Battle Creek, MI 49017. Since April 1984, the MPC Mill manufactures (from 100% recycled paperboard) folding cartons for use in food packaging. The board manufactured by MPC meets applicable standards and protocols including those of the FDA and the American Paper Institute. Folding cartons were also produced at this location until 1997.

- 5. Identify all current and prior owners of each Michigan Paperboard mill identified in response to Request #4. For each such owner or prior owner, further identify:**
 - a. The property owned;**
 - b. The dates of ownership;**
 - c. All evidence showing that the owner controls or controlled access to any portion of the property;**
 - d. All evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the owner's property during the period of its ownership; and**
 - e. The nature of each transaction by which ownership of the mill was transferred from one party to another (e.g. stock purchaser, merger, asset sale, etc.)**

On information and belief, a mill at the current MPC mill location was begun in 1907. Enclosed is a copy of two documents that contain information responsive to this request: "Fiftieth Anniversary, Michigan Carton Company" and a newspaper article hand-dated February 18, 1968. Michigan Holding Corporation bought the mill from St. Regis Corporation under an Asset Purchase Agreement dated April 3, 1984, a copy of which is enclosed herewith. Michigan Holding Corporation changed its name at the closing of the asset purchase transaction to Michigan Carton and Paperboard Company. Then Michigan Carton and Paperboard Company, LP changed its name to Michigan Paperboard Company, LP approximately three years ago. Since April 3, 1984, the entity now known as MPC has owned and operated the MPC Mill.

6. **Identify all current and prior operators, including lessors, of each Michigan Paperboard mill you identified in response to Request #4, or any portion thereof. For each such operator, further identify:**
 - a. **The property at which it conducts or conducted operations;**
 - b. **The dates of operation;**
 - c. **The nature of the operator's operations;**
 - d. **All evidence that the operator controls or controlled access to the property or any portion thereof; and**
 - e. **All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the portion of the property at which the operator conducts or conducted operations.**

Please see response to request #5 above. Since April 1984, the MPC Mill has been operated by Michigan Paperboard Company.

7. **Identify each source or potential source of the release of hazardous substances, pollutants, or contaminants (e.g., polychlorinated biphenyls or "PCBs") from the Michigan Paperboard mill including, without limitation:**
 - a. **Discharges of total suspended solids ("TSS") in wastewater;**
 - b. **Erosion from waste disposal areas located at the Michigan Paperboard mill or elsewhere (e.g., landfill areas) used for the disposal of wastes generated at the Michigan Paperboard mill;**
 - c. **Exceedances of TSS loading limits established by the State of Michigan and/or U.S. EPA;**
 - d. **Dewatering lagoon areas located at the Michigan Paperboard mill;**
 - e. **Storm sewer leaks and discharges;**
 - f. **Sewer line leaks and discharges; and**
 - g. **Machine, transformer or other equipment leaks and discharges.**

MPC currently has an NPDES permit issued by the State of Michigan. The MPC Mill has had an NPDES permit from the state that allowed certain water effluent discharge into the river since April 1984. The discharge of certain pollutants is allowed under this permit, including total suspended solids. Under this permit,

MPC discharges two sources of water: (1) non-contact cooling water and (2) storm water. A copy of the most recent NPDES permit for the MPC Mill issued by the MDEQ and effective August 1, 2001 and the application for this permit dated March 31, 2000 is enclosed with this response. Documents relating to the MDEQ approval of the use of water treatment additives with regard to the NPDES permit discharge dated May 18, 2001 is also enclosed. The prior NPDES permit issued by the DEQ and effective January 1, 1997 is enclosed with this response.

The non-contact cooling water discharged under the NPDES comes from three sources: the Kalamazoo River, the private well on the mill property and, on limited occasions and only as necessary make-up, city water. The engineering design of the non-contact cooling water system at the mill creates a negative pressure on that system so that if there is a breach the non-contact cooling water flows out and any in-flow into the system is prevented. The non-contact cooling water does not come into contact with the processes in the mill. The storm water released under the NPDES program is controlled at the MPC Mill by the Pollution Incident Prevention Plan (PIPP), Spill Prevention Control and Countermeasure Plan (SPCC) and Storm Water Pollution Prevention Plan (SWP3) prepared for MPC by Dell Engineering, Inc. in March 1988, updated and revised in November 1996 and currently being revised and updated with the revisions to conclude in the summer of 2003, a copy of this document is enclosed herewith.

MPC reported an exceedance of the total residual chlorine limits in its NPDES permit to MDEQ in letters dated October 2, 2000 and March 13, 1997. The cause of the exceedance was the need to use city water as make up water for the non-contact cooling water. Documents concerning each such exceedances are enclosed herewith.

MPC reported an exceedance of the outfall flow daily limit in its NPDES permit to MDEQ in letters dated June 16, 2000 and June 16, 2000. In a letter dated May 21, 2001, MPC reported to MDEQ that the high level of the river was interfering with the accuracy of its meter readings. A copy of this correspondence is enclosed herewith.

On March 13, 2001, MPC reported to MDEQ that a very small amount of virgin #6 fuel oil, less than one quart, may have gotten into a containment area and from there possibly into the mill's discharge to the river. A copy of the correspondence is enclosed herewith.

MPC has an Authorization from the City of Battle Creek to discharge process wastewater to the City's sewer system. A copy of Authorization 159 dated July 1, 2002 is enclosed herewith. The contract allows this wastewater to contain certain pollutants, including total suspended solids. The mill has had such an authorization from the City since April 1984. A copy of the Wastewater Treatment contract between the City of Battle Creek and Michigan Holding

Company dated April 1986 and an Addendum to that contract dated August 21, 1995 are enclosed herewith.

The MPC Mill has had a number of exceedances of its sewer permit relating to the volume of water discharged to the City's sewer system or the level of BOD or TSS in the effluent. The exceedances resulted from sporadic equipment and process breakdowns. Prior to release to the City, the MPC Mill notified the City and the City agreed to take the out of compliance effluent. No enforcement action was ever taken by the City. A copy of various correspondence concerning these exceedances from March 29, 1990 up to April 23, 2003 is enclosed herewith.

The MPC Mill was listed for a time on the State of Michigan's 307-site list. The cause for the listing was soil contamination from a discharge of a drain at the mill. The drain was permanently sealed. The Mill performed numerous studies and determined that the release had not impacted groundwater and that the impact on the soil was below any clean-up levels required by the state. A copy of the final documentation to the State of Michigan concerning MPC's investigation dated April 9, 1992 is enclosed. The investigation confirmed that no groundwater at the MPC Mill had been impacted and that the soil contamination was below the applicable state clean-up levels.

During MPC's ownership of the MPC Mill, there have been no waste disposal areas at the mill and consequently, there has been no erosion there from.

During MPC's ownership of the MPC Mill, there have been no dewatering lagoons at the mill.

During MPC's ownership of the MPC Mill, there have been no leaks from the storm sewer or the sewer lines. Discharges from the storm sewer or the sewer lines are described above.

During MPC's ownership of the MPC Mill, there have been no leaks from machines, transformers or other equipment.

Since 1984, the MPC Mill has produced solid waste and hazardous waste that is properly disposed of off-site at appropriately permitted facilities.

- 8. Identify any data, analyses or other information regarding the nature and quantity of hazardous substances released from each source or potential source you identified in response to Request #7, above. To the greatest extent possible, identify any such data, estimates, analyses or other information on an annual basis from 1954 through 1989.**

MPC does not have documents that cover the time periods of this request. During MPC's ownership of the MPC Mill, however, there have been no discharges of hazardous substances from the MPC Mill from the sources identified in request #7

above. A copy of lab analyses for the effluent discharged pursuant to the NPDES permit for various dates in 1997, 1998 and 2001 are enclosed herewith. The characteristics of this effluent should not differ from that discharged in the time period April 1984 through 1989. A Copy of analytical reports for the effluent discharged pursuant to the sewer permit for various dates in 1986, 1987, 1988, 1989 and 1990 are enclosed herewith. The characteristics of this effluent should not differ from that discharged in the time period April 1984 through 1986.

9. **For the period 1954 to 1989, identify for each year the types and amounts of fiber furnish used at each Michigan Paperboard mill in tons. Fiber furnish may include, but is not limited to, old corrugated container (OCC); double-lined kraft (DLK); paperboard; mixed waste paper; fine paper, bond, ledger, envelopes; old newsprint (ONP); pulp substitutes (specify type and source), purchased secondary fiber pulp (specify source); and virgin pulp (specify type).**

MPC does not have documents that cover the time periods contained in this request. The processes at the mill have been fairly consistent since MPC bought the mill in 1984. On information and belief, the types of fiber purchased by MPC currently, should be similar to those that would have been purchased by MPC from 1984 to 1989. MPC uses its own Fiber Raw Material Specifications for the fiber that it purchases; MPC's standards are stricter than the standards of the Institute for Scrap Recycling Industries, Inc. ("ISRI") and include more prohibited materials A copy of both sets of standards are enclosed herewith. The following table indicates the types of fibers and their relative contribution to the total fiber purchases at the MPC Mill currently. The table includes the reference to both the ISRI and MPC grades for your ease of reference; however, the fiber is purchased solely pursuant to the higher MPC standards with regard to quality.

GRADE	MPC	ISRI	PERCENT OF TOTAL FIBER PURCHASES CURRENTLY
011	Corrugated containers	Corrugated containers	28
004	Boxboard cuttings	Boxboard cuttings	23
013	Double-lined kraft cuttings	New double-lined kraft cuttings	9
008	De-ink news and uncoated sections	Special news de-ink quality	8
045	Lightly printed bleach kraft	Printed bleached board cuttings	8
041	Manifold white ledger	Manifold white ledger	9
005	Boxboard rolls	Mill wrappings	4.5
006	News	News	4.5

043	Solid unbleached sulfite	Solid unbleached sulfite	4
024	White blank news	White blank news	3

10. For the period 1954 to 1989 and for each Michigan Paperboard mill, identify the types and amounts of paper products produced annually in tons.

MPC does not have documents that cover the entire time period contained in this request. On information and belief, the processes at the MPC Mill have been fairly consistent since MPC bought the mill in 1984. Below is the production data for recycled paperboard for the time periods indicated. The MPC Mill only produced food-contact paperboard.

Twelve Months Ending April	Tons
1985	97,550
1986	97,341
1987	103,147
1988	103,918
1989	110,643
1990	106,139

11. For each paper product identified in response to Request #10, identify calculated shrinkage (i.e., yield on fiber furnish) for each paper product on an annual basis. If not available, identify typical or estimated shrinkage for each paper product.

MPC does not have documents that cover the time periods contained in this request. The current shrinkage is about 2% by weight. On information and belief, the processes at the mill have been fairly consistent since MPC bought the MPC Mill in 1984

12. Identify, for each Michigan Paperboard mill, the annual operating days per year.

The following table contains the requested information for the years 1985-2002. Information prior to this is not available from MPC.

YEAR	TOTAL OPERATING DAYS
1985	313
1986	322
1987	325
1988	327

1989	352
1990	345
1991	345
1992	347
1993	338
1994	346
1995	346
1996	347
1997	359
1998	349
1999	359
2000	353
2001	344
2002	356

- 13. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke that you purchased directly or otherwise obtained from any of the sources listed in Attachment 2, or from any other NCR paper coating facility.**

MPC did not own the mill during the time frame 1954 through 1971 and has no information regarding operation of the mill during that time frame. In general terms, however, a mill making food grade paper, which the MPC Mill always has done, would not buy NCR for its fiber stock.

- 14. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke and/or NCR paper converter trim that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. Identify, to the extent possible, the name and address of the waste paper broker or other person from whom the NCR paper broke and/or NCR paper converter trim was obtained or purchased.**

Please see response to request #13 above.

- 15. For the period 1954 through 1989, identify the dates (month and year) and amounts in pounds of post-consumer waste paper that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. To the extent possible, identify the name and address of the wastepaper broker or other person from whom the post-consumer waste paper was purchases or otherwise obtained.**

MPC bought the MPC Mill in an asset purchase in April 1984. MPC does not have any records relating to the information requested in this response for 1954 through 1989. At some time during the time frame April 1984-1989, on

information and belief, MPC may have bought Grade 045 fiber from National Fiber Supply, Grade 008 fiber from Golper Supply Co., and Grade 045 fiber from Batliner Paper Stock Co.

- 16. To the extent available and not otherwise identified in response to Requests #14-15 above, identify the current names, addresses and phone numbers for all waste paper brokers or other person from whom you purchased or otherwise obtained any type of secondary fiber during the period 1954 to 1989.**

MPC bought the MPC Mill in April 1984. MPC does not have any records relating to the information requested in this response for 1954 through 1989, except the document reflecting its account payable records for May 1989, a copy of which is enclosed herewith.

- 17. For the period 1954 to 1989 and for each Michigan Paperboard mill, identify the dates (month and year) when save-alls were installed and/or upgraded on each paper machine at the mill.**

A save-all was installed at the mill in October 1961. A copy of a letter from the manufacturer of the save-all installed with attached schematic of the save-all dated November 23, 1960 is enclosed herewith.

- 18. For each save-all identified in response to Request #17, specify the type of each save-all and the estimated efficiency of fiber recovery in percent.**

Dorr-Oliver manufactured the save-all. For details see document submitted in response to request #17 above. The efficiency of fiber recovery is estimated to be 99.2%.

- 19. For the period 1954 to 1989 and on an annual basis, identify the volume and disposition of each of the wastewater streams generated at each Michigan Paperboard mill (e.g., discharged directly to a receiving water with or without treatment; discharged indirectly through a municipal sewerage system; or discharged to an off-site industrial wastewater treatment system), including but not limited to:**

- **Pulping and/or drinking wastewater,**
 - **Paper machine whitewaters, and**
 - **Other process and non-process wastewaters (identify).**
- (Reported volumes of process wastewaters should be specified in either gallons per minute (gpm), gallons per day (gpd), or million gallons per day (mgd).)**

MPC bought the MPC Mill in April 1984. MPC does not have many records relating to the information requested in this response for 1954 through 1989.

Pulping and/or drinking wastewater and paper machine whitewater are currently discharged to the sewer system, as they have been since MPC purchased the MPC Mill in April 1984. The non-contact cooling water and the storm water are currently discharged to the river, as they have been since MPC purchased the MPC Mill in April 1984. Monthly flow records for MPC's discharge to the City of Battle Creek under the sewer permit for 1989, 2002 and 2003 are enclosed herewith. The discharge rates for 1989 should be similar to what they would have been from April 1984 through 1988. Daily Discharge Monitoring Reports relating to the discharge under the MPC Mill's NPDES permit for 2001 are enclosed herewith and the Monthly Operating Reports for the MPC Mill under its NPDES permit for February 1984 through December 1984 are enclosed herewith.

- 20. For the period 1954 to 1989 and on an annual basis, for each of the process wastewater streams identified in response to Request #19, identify the type(s) of on-site wastewater treatment, if any, provided (e.g., settling lagoons, primary treatment in clarifiers, secondary biological treatment; advanced wastewater treatment). Provide schematic diagrams of the wastewater treatment facilities and monthly wastewater treatment system operating data for bypassed flow (i.e., untreated or partially treated wastewaters), treated effluent flow and untreated and treated wastewater total suspended solids (TSS) concentrations and mass discharges (e.g., pounds per day).**

MPC bought the MPC Mill in April 1984. MPC does not have any records relating to the information requested in this response for 1954 through 1989. Since 1984, the MPC Mill has had no wastewater treatment system.

- 21. For the period 1971 to 1989 and on an annual basis, identify the amount in dry tons of wastewater treatment sludge generated at each Michigan Paperboard mill and the disposition of the sludge (e.g., disposed in on-site or off-site landfills).**

MPC bought the MPC Mill in April 1984. MPC does not have any records relating to the information requested in this response for 1954 through 1989. Since 1984, the MPC Mill has generated no sludge.

- 22. Identify the name and location of any facility used for the disposal of wastewater treatment sludge generated at each Michigan Paperboard mill.**

Please see response to request #21 above.

- 23. Identify any data, analyses or other information regarding potential erosion of waste materials from any lagoon, landfill or other disposal facility identified in your response to Requests #19-22.**

MPC bought the MPC Mill in April 1984. MPC does not have any records relating to the information requested in this response for 1954 through 1989.

Since 1984, the MPC Mill has not had any lagoons, landfills or other disposal facilities onsite, and consequently, there has not been any erosion there from.

24. For each Michigan Paperboard mill, provide copies of all reports, data or other records showing PCB concentrations in the following materials:

- **Fiber furnishes used at the mill,**
- **Paper products produced at the mill,**
- **Untreated and treated wastewaters generated at the mill,**
- **Wastewater treatment sludges generated at the mill,**
- **Atmospheric emissions from the mill, and**
- **Machine, transformer or other oils at the mill.**

MPC bought the MPC Mill in April 1984. MPC does not have any records relating to the information requested in this response for 1954 through 1989. Since at least 1999, pursuant to the industry protocol developed to determine compliance with the FDA requirements for material that will have direct food contact and prior to 1999 in response to customer requests, MPC has been testing paperboard produced at its mill for, among other things, PCBs. The RPTA chemical Testing Protocol for Food-Contact Paperboard Made From Recycled Fiber, Second Edition dated September 21, 2001 is enclosed herewith. A copy of these test results of the MPC Mill paperboard pursuant since 1991 is enclosed herewith. The few test results in this time period where there was a detection of PCBs proved to be laboratory error because when that test was rerun, the confirmatory test indicated that the original test result was in error. Consequently, since MPC has tested its paperboard for PCBs, there has never been PCBs accurately detected in its paperboard.

MPC does not have in its possession and control any documents that indicate that the fiber furnishes, wastewaters or atmospheric emissions from the mill have been tested for PCBs. The MPC Mill air permit does not require the testing of its emissions for PCBs.

Since 1984, MPC has not produced any sludge at the mill.

Three PCB transformers were removed from the mill in 1991. None of the transformers had leaked during MPC's ownership of the mill. All of the transformers were properly destroyed. A copy of the Certificates of Destruction and other disposal documentation are enclosed herewith. There is no other equipment containing PCBs that has existed at the MPC Mill since 1984.

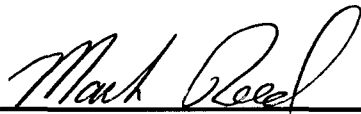
25. Provide copies of all reports, data or other records in your possession, whether generated by Michigan Paperboard or its consultants, generated by paper industry trade associations and/or research organizations, or generated by government agencies and organizations, showing PCB concentrations in the following materials: secondary fibers used as furnishes

to secondary fiber pulp and paper mills; pulp substitutes; virgin pulps; any paper mill products, (e.g., paper, paperboard, tissue); process wastewaters; wastewater treatment sludges; atmospheric emissions, or other materials associated with the pulp and paper industry.

Please see response to #24 above.

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I certify under penalty of law that this response was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon the good faith inquiry of the persons who managed the system and those persons directly responsible for gathering the information, the information submitted is, after good faith inquiry, true, accurate and complete given the records and personnel currently within the possession and control of Michigan Paperboard Company. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I am the responsible corporate official acting on behalf of Michigan Paperboard Company in the preparation of this response and in the execution of this certification.

A handwritten signature in dark ink, appearing to read "Mark Reed", is written over a solid horizontal line.

Mark Reed
General Manager
Michigan Paperboard Company

Dated: May 9, 2003

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